

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Angela Anessa Jamerson

Chapter:13

Case number:1:17-bk-02721

Debtor

Matter: Motion to Compel

Angela Anessa Jamerson

Movant

v.

Nationstar Mortgage LLC d/b/a Mr. Cooper /
Pacific Union Financial, LLC
Respondents

Notice

Notice is hereby given that:

The debtor(s) filed a Chapter 13 Bankruptcy Petition on June 29, 2017.

A hearing on the above referenced matter has been scheduled for:

United States Bankruptcy Court Ronald Reagan Federal Building, Bankruptcy Courtroom (3rd Floor), Third & Walnut Streets, Harrisburg, PA 17101	Date: 8/18/2020
	Time: 9:30 am

Any objection/response to the above referenced matter must be filed and served on or before 8/11/2020.

If service was properly made and Respondent(s) fail to file an objection/response by the above specified date, the Court may determine after review of the Motion that no hearing is required and grant the relief requested.

If a default order has not been signed and entered, the parties or their counsel are required to appear in Court at the hearing on the above date and time.

Date: July 28, 2020

Kara K. Gendron, Esquire
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	CHAPTER 13
ANGELA ANESSA JAMERSON	
Debtor	CASE NO. 1:17-bk-02721
	:
ANGELA ANESSA JAMERSON	:
Movant	:
	:
vs.	:
	:
Nationstar Mortgage LLC d/b/a Mr.	:
Cooper /	:
Pacific Union Financial, LLC	:
Respondent	

MOTION TO COMPEL ACCOUNTING

COMES NOW the Debtor, by and through Kara K. Gendron, Esquire of Mott & Gendron Law and files this Motion, respectfully stating in support thereof:

1. The Debtor filed a Chapter 13 Petition on 6/29/2017.
2. Throughout the bankruptcy case, the Debtor has had difficulty obtaining correct information from her mortgage holder and the mortgagee has filed documents that conflict its own documents, as well as with the debtor's records.
3. The Debtor is attempting to refinance but, despite numerous attempts over several months, the undersigned has been unable to obtain information from the mortgagee to reflect that the mortgagee has corrected its accounting.
4. Some of the issues stem from the fact that the Debtor has paid and has been paying her own mortgage insurance, but the mortgage company is escrowing for insurance per the most recent notice filed on 3/24/2020 and the debtor has sent proof of all insurance payments to counsel for mortgagee. Further, the Debtor has been paying what the mortgage company had told her to pay, but the mortgagee continues to report an escrow shortage and different payment amounts on documents that it files with the Court. The Debtor believes that the mortgage

company should credit whatever funds it might have sent to an insurance company, since the Debtor had already paid the insurance every year. It is impossible to determine whether the escrow is truly short due to the mortgage company giving her (apparently) inaccurate payment figures in the past or whether it is due to mistakes in accounting or both.

5. The Debtor requests that this Court direct Respondent to provide an accounting of the mortgage from the inception of the mortgage to present date, showing at a minimum 1) payments received and check numbers, 2) when the payments were received, 3) how the payments were applied, 4) the basis and authority for any fees and costs, 5) the running principal balance, 6) amounts in suspense, and 7) amounts in escrow.

6. The Debtor believes that having an accounting of record will streamline the resolution of any discrepancies and will minimize any future disputes as to amounts owing under the mortgage and will give her the ability to refinance without overpaying the Respondent.

7. The Debtor requests that the Court enter an order directing Respondent to provide a transactional Code key and an accounting within thirty days.

WHEREFORE, the Debtor respectfully requests that this Court enter an order directing Respondent to provide a transactional Code key and an accounting of the mortgage from the inception of the mortgage to present date, showing at a minimum 1) payments received and check numbers, 2) when the payments were received, 3) how the payments were applied, 4) the basis and authority for any fees and costs, 5) the running principal balance, 6) amounts in suspense, and 7) amounts in escrow within thirty days and granting such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron
Kara K. Gendron, Esquire
Attorney ID #87577
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ANGELA ANESSA JAMERSON	:
Movant	:
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vs.	:
:	
Nationstar Mortgage LLC d/b/a Mr.	:
Cooper /	:
Pacific Union Financial, LLC	:
Respondent	:
:	
:	

O R D E R

UPON CONSIDERATION of the Motion to Compel Accounting, it is hereby
ORDERED AND DECREED that the Respondent must provide a transactional Code
key and an accounting as detailed in the Motion to Compel, and serve Debtor's counsel within
thirty days of the date of this Order.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: : **CHAPTER 13**
ANGELA ANESSA JAMERSON :
: **CASE NO. 1:17-bk-02721**
:
:
Debtor(s) :

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on July 28, 2020, I served a copy of the served a copy of the foregoing document(s) electronically or by placing the same in the United States Mail, First Class, postage pre-paid, addressed as follows on the following parties:

Name and Address	Mode of Service
CHARLES J DEHART, III ESQUIRE 8125 ADAMS DRIVE SUITE A HUMMELSTOWN PA 17036	Electronically
ANGELA ANESSA JAMERSON 154 SPRING MEADOWS ROAD MANCHESTER, PA 17345	Electronically
Kristen D Little on behalf of Creditor Nationstar Mortgage LLC d/b/a Mr. Cooper pabk@logs.com	Electronically

I certify under penalty of perjury that the foregoing is true and correct.

Date: 07/28/2020

/s/ Kara K. Gendron

Kara K. Gendron, Esquire
Mott & Gendron Law
125 State Street
Harrisburg, PA 17101
(717) 232-6650 TEL